

# **Exhibit B**



Graves Garrett LLC

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November 20, 2019

**By Electronic Mail**

Google, LLC  
Subpoena Compliance  
[google-legal-support@google.com](mailto:google-legal-support@google.com)

**Re: Document Subpoena to Google LLC and YouTube.com, in the Matter  
*Eastern Profit Corporation Limited v. Strategic Vision US LLC*,  
Case No. 1:18-cv-02185-JGK-DCF (S.D.N.Y.)  
Internal Ref. Nos. 3101988, 3097957 and 3101994**

Dear Sir or Madam:

We are in receipt of your letters dated November 8, 2019 and November 14, 2019, respectively, advising us of Google's response and objections to our October 31 subpoena for information related to various YouTube accounts and for our November 4 subpoenas for information related to additional YouTube accounts and several Gmail accounts.

In particular, our Oct 31, 2019 subpoena sought information related to the YouTube accounts associated with users p2Hjw3UG6sW9bs12EoiApA, 7uiiuayHKz0SC3EbXdr6iA, ujLoHxA16TveAXWGx2xSg, fG2D1ZWtFvp5p3g15PHmmg, NKpqlqrErG1a-ydQ0D5dcA (Ref. No. 3097957) ; the November 4 subpoena sought records related to the YouTube accounts associated with O3pO3ykAUybrjv3RBbXEHw, dWxcRRnVa4FeLZ85Rx\_WDw, M8t0FbweERXYrxqIk3y7wg (Ref. No. 3101988), and the November 4 subpoena sought records related to the Google Accounts associated with CALVINHO77777@GMAIL.COM, GSPPRINGGROUP@GMAIL.COM, YVETTE.YUE423@GMAIL.COM, RLRPG@GMAIL.COM, WENGUIGUO@GMAIL.COM, and SARAWEI31@GMAIL.COM (Ref. No. 3101994)

After the Subpoenas were served, counsel to a nonparty in the matter notified us that one of the three YouTube accounts and one of the six email addresses belong to their clients, Mr. Guo Wengui and Ms. Yvette Wang, respectively, and that they object to the subpoenas' requests for "geographic and tracking data," among other things. This letter serves as our notice to Google of our withdrawal of each of the Subpoenas' Request No. 6, which we believe is the only request that could form the basis of the nonparties' objections to our seeking "geographic and tracking data."

Request No. 6, copied below, is withdrawn.

**Ref. No. 3101994**— *Document Request No. 6: All data described in Your Privacy Policy, including but not limited to protocol data, tracking data, geographic data, data related to mobile applications, Whois data, and data collected by cookies and similar technologies, associated with the Gmail Accounts.*

**Ref. Nos. 3097957 and 3101988**—*Document Request No. 6: All data described in Your Privacy Policy, including but not limited to protocol data, tracking data, geographic data, data related to mobile applications, Whois data, and data collected by cookies and similar technologies, associated with the YouTube Channels.*

We will notify counsel for the nonparties of this modification to the Subpoenas and our notice to you of the same.

Finally, your correspondence indicated that Google requests the opportunity to meet and confer in advance of any filing for judicial relief related to Google's asserted objections to the Subpoenas. We continue to review the objections and arguments Google asserts in the November 8 and 14 letters, and will plan to meet and confer regarding the same in advance of any court filing. However, to the extent Google's objections relate to concerns about disclosure of "anonymous" Google users in violation of the First Amendment, we note that counsel for various nonparties associated in this case have admitted that several of the YouTube and email addresses belong to nonparties whose identities are known, and who in fact have been ordered to comply with discovery in this case, including sitting for depositions.

If you have any questions regarding this letter or other matters related to the Subpoenas, please contact me or my colleague Lucinda Luetkemeyer at [LLuetkemeyer@GravesGarrett.com](mailto:LLuetkemeyer@GravesGarrett.com).

Sincerely,

A handwritten signature in cursive script, appearing to read "Edward D. Greim".

Edward D. Greim